

Hearing date: November 30, 2006  
10:00 a.m. Eastern  
Response deadline: November 22, 2006  
4 p.m. Eastern

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
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In Re:

DELPHI CORPORATION, et al.,

Case No. 05-44481 (RDD)

Debtors.  
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**NOTICE OF MOTION OF USW TO COMPEL DEBTORS TO SUBMIT INDIVIDUAL  
EMPLOYEE MATTER TO IMPARTIAL MEDICAL AUTHORITY**

**PLEASE TAKE NOTICE** that the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO/CLC ("USW"), successor by merger to the United Steelworkers of America, and its Local Union No. 87L have filed a motion (the "Motion to Compel") in the Bankruptcy Court seeking an Order directing the Debtors to honor the impartial medical dispute provisions of the collective bargaining agreement between the USW and the Debtors.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion to Compel will be held on **November 30, 2006 at 10:00 a.m. prevailing Eastern Time** before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, New York 10004.

(A) **PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Motion to Compel shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for the USW as set forth below, and upon counsel to the Debtors, so as to be received by 4:00 p.m. prevailing Eastern time on November 22, 2006. Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

MEYER, SUOZZI, ENGLISH &amp; KLEIN, P.C.

By: /s/

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Dated: November 2, 2006